

**BEFORE  
THE PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA  
DOCKET NO. 2018-163-E**

IN RE: )  
SolAmerica SC, LLC and Edgefield County )  
S1, LLC - Request for Modification of an )  
Interconnection Agreement for Solar Project )  
located in Edgefield County, South Carolina )  
)  
)  
)

**RESPONSE  
TO SCE&G's  
"MOTION TO DISMISS THE  
COMPLAINT (*sic*) TO MAINTAIN  
STATUS QUO"**

**INTRODUCTION**

SolAmerica SC, LLC and Edgefield County S1, LLC, (hereinafter collectively as, SolAmerica"), filed a "Motion to Maintain Status Quo", with this Commission on May 9, 2018, in Docket 2018-163-E. Thereafter, this Commission's Directive Order No. 2018-406, ruled on the status of SolAmerica's Motion and read in pertinent part, "**Further, I move that we hold pending motions in abeyance until that hearing.**" (Emphasis not in original).

South Carolina Electric & Gas, Company (hereinafter as, "Company"), filed a "Motion to Dismiss the Complaint (*sic*) to Maintain Status Quo" on June 27, 2018, (the Company improperly refers to SolAmerica's "Motion", as a "Complaint"). SolAmerica's Response to the Company's Motion follows.

**RESPONSE**

**The Company's Motion is Held in Abeyance.**

As for the Company's Motion to Dismiss described hereinabove, and in light of this Commission's Directive Order cited above, the Company's Motion, as soon as filed, became a "Pending Motion", and according to the terms of this Commission's Directive Order No. 2018-406, the Company's Motion is therefore held in abeyance until the Hearing in this matter.

Reservation of Rights.

If this Commission should find that this Commission's Directive Order, as described hereinabove, does not place Pending Motions, such as the Company's Motion, in abeyance, SolAmerica (i) opposes the relief sought by the Company and (ii) reserves the right to file a more substantive Response to the Company's Motion. Furthermore, the Company's Motion only contains conclusory, *ipse dixit* statements, which would not have provided a legal basis for this Commission to dismiss SolAmerica's timely and well supported Motion to Maintain Status Quo.

**CONCLUSION**

**WHEREFORE**, based on the foregoing, and this Commission's Directive Order No. 2018-406, issued on June 6, 2018, in this Docket, this Commission should find that the Company's Motion is placed in abeyance, until the Hearing in this matter;

**AND GRANT SUCH OTHER AND FURTHER RELIEF AS THIS COMMISSION MAY DEEM JUST AND PROPER.**

This 9<sup>th</sup> day of July, 2018.

Respectfully Submitted,

/s/

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July 9, 2018  
 Columbia, South Carolina